

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 22-223 (NEB/DTS)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**GOVERNMENT’S MOTION IN LIMINE
TO PRECLUDE REFERENCE TO
DEFENDANTS’ PUNISHMENT OR
SENTENCING MATTERS**

1. AIMEE MARIE BOCK,
3. SALIM SAID,
4. ABDULKADIR NUR SALAH,
- and
6. ABDI NUR SALAH,

Defendants.

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Joseph H. Thompson, Harry M. Jacobs, Matthew S. Ebert, and Daniel W. Bobier, Assistant United States Attorneys, respectfully submits the following motion in limine to preclude the defendants or their counsel, in the presence of the jury, from mentioning or referring to the potential punishment, penalty, sentence, or collateral consequence that the defendants may face if convicted at trial.

It is well established that a jury should “reach its verdict without regard to what sentence might be imposed.” *Shannon v. United States*, 512 U.S. 573, 579 (1994) (citation omitted). This is because, “in the federal system the traditional role of the jury has been to decide questions of guilt or innocence, and not to determine the proper punishment a defendant should receive.” *United States v. Thomas*, 895 F.2d 1198, 1200 (8th Cir. 1990) (emphasis in original). “[P]roviding jurors sentencing

information invites them to ponder matters that are not within their province, distracts them from their fact-finding responsibilities, and creates a strong possibility of confusion.” *Shannon*, 512 U.S. at 579.

The only issue for the jury to determine in this matter is the defendants’ guilt or innocence relating to the charges against them. If convicted, it is solely for the Court to decide what punishment the defendants receive. Any mention or discussion of the punishment the defendants face if convicted is irrelevant to the jury’s task and invites confusion and prejudice. Accordingly, the United States moves to preclude the defense—including the defendants, should they take the stand—from referencing any possible punishment following a conviction at trial.

Dated: January 10, 2025

Respectfully Submitted,

ANDREW M. LUGER
United States Attorney

/s/ Joseph H. Thompson

BY: JOSEPH H. THOMPSON
HARRY M. JACOBS
MATTHEW S. EBERT
DANIEL W. BOBIER
Assistant United States Attorneys